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August 21, 2009

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Mr. Jeff Derouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

AUG 21 2009
PUBLIC SERVICE
COMMISSION

Re: Case No. 2009-00124

Dear Mr. Derouen:

Enclosed for filing please find Frankfort Plant Board's Motion for Full Intervention in the above referenced matter.

I appreciate your assistance. If you have any further questions, please contact me at (502) 352-4541 or hprice@fewpb.com.

Sincerely,

Hance Price
Staff Attorney

HP/mw
encl.

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AUG 21 2009

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

TARIFF FILING OF KENTUCKY-AMERICAN)	
WATER COMPANY TO REVISE THE)	CASE NO.
KENTUCKY RIVER AUTHORITY)	2009-00124
WITHDRAWAL FEE)	

Motion for Full Intervention by Frankfort Plant Board

Pursuant to the Commission's August 18, 2009 Order in this matter, Frankfort Plant Board respectfully requests that it be granted full intervention.

In support of its motion, Frankfort Plant Board notes that it is subject to KRA fees because it operates a water treatment plant that withdraws water from the Kentucky River. Moreover, Frankfort Plant Board sells water to wholesale customers regulated by the Kentucky Public Service Commission. Consequently, the Commission's ruling in this matter could impact how Frankfort Plant Board recovers the KRA fee from its wholesale customers.

WHEREFORE, for the foregoing reasons, Frankfort Plant Board respectfully requests that the Commission grant its motion for full intervention.

Respectfully Submitted:

Hance Price
Hance Price
317 West Second Street
Frankfort, KY 40601
Attorney for Frankfort Electric and
Water Plant Board

This the 21st day of August, 2009.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Full Intervention has been sent by first-class mail, postage prepaid, on this date, 8/21, 2009, to the following:

Hon. Lindsey W. Ingram III
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507-1801

Hon. David E. Spenard
Utility and Rate Intervention Division
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204

Hance Price